| UNITED STATES BANKRUPTCY COU SOUTHERN DISTRICT OF NEW YOR | K |
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| In re: DPH HOLDINGS CORP, et al., |) Chapter 11 Case No. 05-44481 (RDD)) |
| DELPHI AUTOMOTIVE SYSTEMS, LLC |) ;,) |
| Plaintiff, |) Adv. Pro. No. 07-02259 [RDD] |
| v. |))) |
| BLAIR STRIP STEEL CO., | .) |
| Defendant. |) x |
| DECLARATION | OF JEAN R. ROBERTSON |
| STATE OF OHIO |) |
| COUNTY OF CUYAHOGA |) ss.:) |

Pursuant to 28 § 1746, Jean R. Robertson declares as follows:

Background

- 1. I am an attorney and partner with the firm Calfee, Halter & Griswold, LLP ("<u>Calfee</u>"), and the chair of Calfee's Business Restructuring and Insolvency practice group.¹
- 2. I have personal knowledge of the facts set forth herein, and if I were called to testify, I would and could testify competently concerning these facts.

¹ Except as otherwise stated herein, all capitalized terms shall have the same meaning as set forth in Reorganized Debtors' Amended Omnibus Response to Certain Defendants' Submissions Regarding the October 2, 2009 Supplemental Postconfirmation Extension of Avoidance Action Service Deadline Motion [Docket No. 21571].

- 3. I am one of the attorneys for Blair Strip Steel Co. ("Blair Strip Steel") in the above captioned action.
- 4. I am also the originating attorney for Blair Strip Steel and the billing partner at Calfee responsible for the management of Calfee's engagement with Blair Strip Steel.
- 5. Blair Strip Steel did not become a client of Calfee until May 21, 2010.
- 6. Prior to May 21, 2010, neither Calfee nor I provided legal services to Blair Strip Steel and did not represent Blair Strip Steel with regard to any legal proceedings, including the above captioned adversary or bankruptcy proceedings.
- 7. As reflected on the official docket of the United States Bankruptcy Court for the Southern District of New York, neither I nor any Calfee attorney appeared on behalf of Blair Strip Steel in either the above captioned adversary or bankruptcy proceedings until after May 21, 2010.
- 8. Neither Calfee nor I provided notice to Blair Strip Steel of any filings in the above captioned adversary or bankruptcy proceedings until on or after May 21, 2010, including, but not limited to, the First Amended Plan Disclosure Statement [Docket No. 11974], the Preservation of Estate Claims Procedures [Docket No. 9039], the August 16, 2007 Preservation of Estate Claims Procedures Order [Docket No. 9105], the First Extension Motion [Docket No. 12922], the First Extension Order [Docket No. 13277], the Second Extension Motion [Docket No. 13361], the Second Extension Order [Docket No. 13484], or the Final Extension Motion [Docket No. 18952].

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

October 5, 2011

Jean R Robertson